

# Exhibit 19

## 3505-20

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN FRANCISCO DIVISION  
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6 IN RE: JUUL LABS, INC., MARKETING,  
7 SALES PRACTICES, AND PRODUCTS Case No.  
LIABILITY LITIGATION 19-MD-02913-WHO

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15 VIDEO-RECORDED DEPOSITION of VINCENT MATTHEWS

16 (Via videoconference)

17 Thursday, September 16, 2021  
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24 REPORTED BY:  
25 CYNTHIA MANNING, CSR No. 7645, CLR, CCRR  
JOB NO. 199625

1 Q. Are you aware of any specific conduct,  
2 again putting aside the Complaint, by Altria in  
3 connection with the marketing or advertising of  
4 JUUL products?

5 A. I'm sorry. Your question -- I'm just  
6 trying to understand your question. If you could  
7 ask that again.

8 Q. I'm just trying to ask you -- I want you  
9 to put aside what -- what you may have an  
10 understanding about from the Complaint, and I'm  
11 just asking what you personally have any  
12 knowledge of.

13 So I'm asking if you have any knowledge  
14 of any specific conduct by Altria in connection  
15 with the marketing or advertising of JUUL  
16 products?

17 I'm talking about conduct by Altria as  
18 opposed to conduct by Juul, if that helps.

19 A. Okay. No.

20 Q. And are you aware of any specific  
21 conduct by Altria in connection with any retail  
22 services provided by Altria for Juul?

23 A. I am not aware.

24 Q. Are you aware of any specific conduct by  
25 Altria in connection with any distribution

1 services provided by Altria for Juul?

2 A. Other than the Complaint, no.

3 Q. And are you aware of any specific  
4 conduct by Altria of any kind related to Juul  
5 other than what you have read in the Complaint?

6 A. Not other than what I have read in the  
7 Complaint.

8 Q. Do you know if there are any stores in  
9 your district where Altria offered retail  
10 services related to JUUL products?

11 A. I am not sure.

12 Q. Do you know whether any of your students  
13 ever purchased JUUL products from retail stores  
14 where Altria provided retail services?

15 A. I am not sure.

16 Q. Do you know whether any of your students  
17 ever received any e-mails from Altria about JUUL  
18 products?

19 A. I'm not sure.

20 Q. Do you know whether any of your students  
21 ever received any materials from Altria by direct  
22 mail about JUUL products?

23 A. I'm not sure.

24 Q. Do you know whether any of your students  
25 ever received Juul marketing material through a

1 pack of cigarettes distributed by Altria?

2 A. I'm not sure.

3 Q. Do you know whether any of your students  
4 have ever been to the Altria website?

5 A. Not sure.

6 Q. Do you know whether any of your students  
7 have ever been to the Philip Morris website?

8 A. Not sure.

9 Q. Do you know whether any of your students  
10 have ever signed up for an Altria mailing list?

11 A. Not sure.

12 Q. Do you know whether any of your students  
13 have ever signed up for an Altria e-mail list?

14 A. Not sure.

15 Q. Are you aware of any communications or  
16 interactions between Altria and the San Francisco  
17 School District for any reason?

18 A. I don't -- I'm not aware.

19 Q. Are you aware of any communications or  
20 interactions between Altria and any of the  
21 individual schools in your district for any  
22 reason?

23 A. I'm not sure.

24 Q. And the last few questions would  
25 include, I presume, any communications or